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July 27, 2023

BY ECF

The Honorable Michael A. Shipp
United States Judge
District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: United States v. Township of Jackson et al.
Civil Action No. 20-CV-6109 (MAS)(JBD)**

Dear Judge Shipp,

Pursuant to Your Honor's July 20, 2023 Order in the above-referenced case (see Docket Entry 54), the United States respectfully submits this status letter on behalf of all parties. Since July 7, 2022, when Your Honor entered the Consent Decree in this case, the parties have been working to meet its requirements. To date, defendants have fulfilled their respective obligations under the Consent Decree¹ with the exception of the following, which are now overdue: (1) implementation of the complaint procedure required by Paragraph 33; (2) completion of training and signed statements of trainees required by Paragraph 34; and (3) provision of the second report required by Paragraph 35 (due on July 6, 2023). Defendants have indicated that they anticipate submitting the second report required by Paragraph 35 by July 28, 2023. The parties have also participated in two status conferences before Magistrate Judge Arpert regarding this case and the related private litigation entitled W.R. Property, LLC v. Jackson, 3:17-cv-03226 (MAS)(DEA).

Thank you for Your Honor's consideration of this submission.

¹ This letter does not take into account Consent Decree deadline requirements that have not yet been triggered.

Respectfully submitted,

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